Rosefield Solar Farm

Applicant's Response to Other Deadline 1 Submissions

EN010158/APP/8.14
Revision 01
Deadline 2
April 2026
Rosefield Energyfarm Limited

APFP Regulation 5(2)(q)
Planning Act 2008
Infrastructure Planning
(Applications: Prescribed Forms
and Procedure) Regulations 2009

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1. Introduction

1.1. Purpose of the Report

1.1.1. This Report provides the Applicant's response to the other Deadline 1 submissions that are not Buckinghamshire Council's Local Impact Report or any Written Representation made in respect of the proposed Rosefield Solar Farm (the 'Proposed Development').

1.1.2. A small number of 'other submissions', beyond the Written Representations and Buckinghamshire Council's Local Impact Report, were made and can be summarised as follows:

- Submissions from Miles Roberts **[REP1-205]**, Buckinghamshire Council **[REP1-115]**, Dr Chris Jordan **[REP1-160]** and Greg Smith MP for Mid Buckinghamshire **[REP1-176]** responding to points raised in oral submissions at the hearings;
- Submissions from National Trust **[REP1-131]**, Natural England **[REP1-123]** and Buckinghamshire Council **[REP1-111]** providing their Deadline 1 PADS;
- Submission from Emily Utley **[REP1-164]** providing response to comments on Relevant Representations;
- Late submission from Samuel William Field **[REP1-302]** accepted at the discretion of the Examining Authority;
- Submissions from Buckinghamshire Council **[REP1-113]** and **[REP1-114]** requesting to be heard at a future compulsory acquisition hearing and a future open floor hearing respectively; and
- Additional submission from Kay Rutland **[AS-041]** accepted at the discretion of the Examining Authority.

1.2. Structure and Approach

1.2.1. This report is structured as follows:

- **Section 2** provides clarification as to which of the 'other submission' documents the Applicant is responding to, or otherwise, and the reason(s) why; and
- **Section 3** provides the Applicant's summarisations and responses to, as appropriate, the key points raised within each of the 'other submission' documents.

1.2.2. **Section 3** addresses each 'other submission' document in turn as opposed to being taken in a thematic way; which is the approach reflected in **Applicant's Response to Buckinghamshire Council's Local Impact**

Report [EN010158/APP/8.11] and **Applicant's Response to Written Representations [EN010158/APP/8.12]**.

1.2.3. Finally, this Report has been structured to provide the Applicant's summarisations of the key matters raised in the 'other submission' documents that have not already been addressed by and large in the **Applicant's Response to Buckinghamshire Council's Local Impact Report [EN010158/APP/8.11]** and **Applicant's Response to Written Representations [EN010158/APP/8.12]**. The Report then provides the Applicant's responses to those key matters raised.

2. Scope of this Report

2.1. Applicant's Position on Providing Responses

2.1.1. This Section expands on each of the 'other submission' documents identified in Section 1.1 and whether this report provides a response to them or, if not, the reason(s) why the Applicant is not responding to an 'other submission' document.

Party and Examination Reference	Responded to in this Document?	Reason
Miles Roberts [REP1-205]	Yes	The Applicant wishes to respond to points made in this submission.
Buckinghamshire Council [REP1-115]	No	The Applicant has not provided a response to this submission. It provides summaries of oral submissions made by Buckinghamshire Council at the Preliminary Meeting, Open Flood Hearing 1 and Compulsory Acquisition Hearing 1 and the Applicant does not consider that it contains any material matters to respond to.
Dr Chris Jordan [REP1-160]	Yes	This submission captures comments made at Compulsory Acquisition Hearing 1 and the Applicant wishes to respond to those comments.
Greg Smith MP for Mid Buckinghamshire [REP1-176]	No	The Applicant recognises this submission to reference the submitted speaking notes which the Examining Authority has taken as a Written Representation. The referenced Written Representation has been responded to by the Applicant in **Applicant's Response to Written Representations [EN010158/APP/8.12]** and so the Applicant does not consider a response is needed to this submission.
National Trust [REP1-131]	No	The Applicant considers that the matters raised in this submission are covered between the Party and the Applicant in the **Statement of Common Ground with National Trust [EN010158/APP/5.17.2]** and so the Applicant does not consider a response is needed to this submission.
Natural England [REP1-123]	No	The Applicant considers that the matters raised in this submission are covered between the Party and the Applicant in **Draft Statement of Common Ground with Natural England**

Party and Examination Reference	Responded to in this Document?	Reason
		[EN010158/APP/5.14] [REP1-025]and so the Applicant does not consider a response is needed to this submission.
Buckinghamshire Council [REP1-111]	Yes	This submission is Buckinghamshire Councils Principal Areas of Disagreement Statement. The Applicant considers that there are additional matters raised in this submission that were not raised in Buckinghamshire Council's Local Impact Report or Written Representation and so the Applicant wishes to respond to these matters only.
Emily Utley [REP1-164]	Yes	The Applicant wishes to respond to points made in this submission.
Samuel William Field [REP1-302]	Yes	The Applicant wishes to respond to points made in this submission.
Buckinghamshire Council [REP1-113] and **[REP1-114]**	No	The Applicant notes the request of Buckinghamshire Council to be heard at future Compulsory Acquisition and Open Floor Hearings. There is nothing further in these submissions for the Applicant to respond to.
Kay Rutland [AS-041]	Yes	The Applicant wishes to respond to points made in this submission.

3. Applicant's Responses

Table 3-1: Miles Roberts [REP1-205]

Para. Ref.	Topic Matter and Summary of Position	Applicant's Response
1	**Amenity and Visual Impact** Comment disputing comments made noting that the Proposed Development would not impact on local amenity or the wellbeing of local residents. Further comment noting the Proposed Development is in a direct line of sight from the Party's home and that the loss of direct views will impact their mental health and wellbeing. Further comment noting three pictures have been attached to the submission to reflect the above comments.	As detailed in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** no significant adverse visual effects have been assessed for residents of Botolph Claydon. The view taken from the upstairs window of the property on Orchard Way is circa 0.5km from the first row of solar PV modules in Field D3 (South) and corresponds with viewpoint 8 in **ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4.3]** which is located somewhat closer to the Proposed Development. As further illustrated by the photomontage of viewpoint 8 in **ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4.3]**, residents would initially experience views of the first row of solar PV modules to the northern edge of Field D3 (South). Longer distance views to Runts Wood would remain, albeit there would be some screening to its lower levels as a result of the Proposed Development. By year 10, views of the solar PV modules would be almost entirely screened by infilling the gap in the existing hedgerow field boundary whilst views to Runts Wood would be retained; it is considered that this mitigation planting would be viewed as a characteristic feature within the existing landscape. The Applicant therefore considers that the views from the property would not approach the threshold for harm as considered in the **ES Volume 4, Appendix 10.5: Residential Visual Amenity Assessment [EN010158/APP/6.4] [APP-114].**
2	**Traffic and Cumulative Impact** Comment noting concern with the traffic and noise that will be generated by the Proposed Development's construction. Further comment noting that the Party has moved to sleeping at the rear of their property due to existing construction traffic from HS2 and East West Rail construction works. Further comment noting that existing disruption to traffic has increased general traffic, due to road closures and diversions.	As detailed in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131]**, no construction traffic is proposed to pass through Botolph Clayton. No road closures or diversions are proposed as part of the works. The works and transport to Site are to be controlled to avoid noise issues. A construction phase noise assessment has been undertaken in accordance with BS 5228-1:2009+A1:2014 as presented within **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040]**. No noise effects are identified as being significant following the adoption of appropriate mitigation measures. The range of mitigation measures are set out in the **Outline Construction Environmental Management Plan (Outline CEMP) [EN010158/APP/7.2.3].**
3	**Scale of the Development** The scale of the development seems to be completely overwhelming for an area that is of general arable farm land use. Drawing a circle out to a 10 mile diameter from the centre of the Proposed Rosefield solar panels site and comparing the scale of the site plus any associated BESS and Power station infrastructure to all other developed Urban villages within the circle it can be seen that this development is larger than all the villages and dwellings constructed in this area over the last 400 years!	The scale of the Proposed Development has been carefully considered, balancing the need to maximise the grid capacity, in line with government policy, whilst also making the most efficient use of the land and avoiding unacceptable impacts. The **Planning Statement [EN010158/APP/5.7.2] [AS-027]** sets out the justification for the Proposed Development, including its scale and why large scale projects like the Proposed Development are needed alongside smaller scale (roof top) solar.

Table 3-2: Dr Chris Jordan [REP1-160]

Para. Ref.	Topic Matter and Summary of Position	Applicant's Response
Background, 1.1	**Agricultural Land** Comment rebutting the Applicant's position that the Site is of low agricultural value (due to much of the Site being classified as Grade 3b) since the Site includes part of the former Drovers Way from Buckingham to Aylesbury that passes down from Sion Hill, through Parcel 3. Further comment noting that animals were brought along these fields from as far as Wales to London with a reference that describes these fields as *"the richest grass Welsh cattle would ever encounter".*	The Applicant's position that the land is of low agricultural value is based on its Agricultural Land Classification (ALC) grading, which grades land in terms of agricultural versatility, not grazing productivity. Grade 3b is defined as *"Land capable of producing moderate yields of a narrow range of crops … or high yields of grass which can be grazed or harvested over most of the year".* There is therefore no contradiction in the claim that the land is not of high agricultural quality but may have been chosen as part of a historical droving route for its grazing productivity. The ALC survey undertaken within the Order Limits, described in **ES Volume 4, Appendix 12.1: Agricultural Land Classification Report [EN010158/APP/6.4] [APP-126]**, identified that land within Parcel 3 as comprising heavy clay or clay loam topsoils overlying slowly permeable clay subsoils at shallow depth, resulting in a soil wetness limitation and classification as Subgrade 3b. This limitation restricts the range and reliability of arable crops that can be grown, but is less limiting for permanent grassland, which typically relies on shallower rooting depths. References to historical droving routes and generalised descriptions of pasture quality do not provide evidence that the inherent soil limitations identified by the survey are absent within Parcel 3, nor do they conflict with the ALC conclusions. As set out within the **Outline Landscape and Ecological Management Plan [EN010158/APP/7.6.2] [REP1-086],** grazing will continue during the operation phase where practicable.
Background, 1.3 and Consequences of Granting CPO Rights, 5.5 and 5.6	**Agricultural Tenants** Comment noting that a tenant farmer has been evicted in anticipation of the Proposed Development and that their knowledge and skill has been lost. Further comment that the integration of the farmer's family with the community has been lost.	The Applicant can confirm that no tenant farmers have been evicted in anticipation of the Proposed Development. Two tenant farmers remain within the Proposed Development and are in active discussions regarding replacement land. A third tenant farmer surrendered his interests as set out at Appendix 2 of the **Written Summary of Applicant's Oral Submissions at Open Floor Hearing 1 (OFH1) [EN010158/APP/8.6] [REP1-106].**
Background, 1.4	**Agricultural Character** Comment noting that agriculture has shaped the landscape with small fields and extensive hedgerows present. Further comment noting that these are features of the Local Landscape Character Areas and that many fields retain ridge and furrow profiles.	Paragraph 10.10.24 of the **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** notes there would be no change to the landscape fabric of the Order Limits with the exception of the minimum required removal of existing hedgerow to achieve the necessary access/visibility. The existing field and hedgerow pattern will therefore be retained. In addition, paragraph 5.2.16 of the **Outline Landscape and Ecological Management Plan (Outline LEMP) [EN010158/APP/7.6.3]** requires a detailed survey of all hedgerows within the Order Limits and identifies lengths of hedgerow which require infilling of gaps or increasing in density. In accordance with the **Outline LEMP [EN010158/APP/7.6.3]** extensive new hedgerow and woodland planting, which would far exceed the amount removed during construction, will respond directly to specific guidelines in the Aylesbury Vale Landscape Character Assessment, robust baseline surveys and consultations with relevant consultation bodies in order to be appropriate to local character. Ridge and furrow earthworks can be preserved beneath Solar PV modules with only minimal disturbance from piled supports.

Applicant Assessment, 2.1	**Agricultural Businesses** Comment noting that Appendix 14.1 of the ES makes no reference to agricultural businesses within the area and that the Applicant has not had regard to the importance of agriculture. Further comment noting that Prestons Farms is not included in Appendix 14.1 of the ES and that it's sister company, provides a unique and irreplaceable pillar to the NHS.	**ES Volume 4, Appendix 14.1: List of commercial operations/businesses within the community study area [EN010158/APP/6.4] [APP-130]** is intended to identify commercial operations/businesses in non-agricultural sectors. The baseline details of agricultural landowners and tenants are deliberately not disclosed in the DCO Application documents. Prestons' Farm and TCS Biosciences are referenced within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** at paragraph 14.5.51 (which includes details of the fields in the Order Limits to be affected in the operations' tenancy, and notes that TCS Biosciences is a non-agricultural business within this tenancy), paragraph 14.5.56 (which identifies the high-level operations of TCS Biosciences). The Applicant entered into a Non-Disclosure Agreement with Prestons' Farm (at Prestons' Farms request) and was keen to limit public reference to the specific operations and sensitivities of TCS Biosciences to reduce the risk of sensitive operations being adversely affected. Nonetheless, the Applicant has recognised the operation's unique, important and sensitive nature in the attention provided through bilateral engagement, and iterative design and mitigation development through the pre-application (and post-submission) phase. The Applicant has taken into account considerations of the continued operation of TCS Biosciences Ltd, in terms of land use, access, and management of environmental effects (relating to animal welfare and biosecurity) both in the iterative development and design of the Proposed Development, and in the approach to adaptive, flexible and best-practice mitigation. A detailed response to the Written Representations from Prestons' Farms and TCS Biosciences Ltd **[REP1-133]** has been submitted by the Applicant at Deadline 2 (**Appendix 1: Response to the Written Representation received from TCS Biosciences Ltd and Preston Farm** of the **Applicant's Response to Written Representations [EN010158/APP/8.12]**) to provide a clear, single document setting out the detail of the Applicant's position regarding the effects on and mitigation for these commercial operations.
Applicant Assessment, 2.3 and Consequences of Granting CPO Rights, 5.1 and 5.2	**Agricultural Businesses** Comment noting that the Applicant appears to view landholdings as commodities with little, if any attention, being paid to: the working of land, nature of soil, biosecurity, local farming community and animal husbandry.	The Applicant has considered agricultural landowners and tenants as detailed in **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]**. The Applicant has also considered the feedback received from agricultural landowners and tenants throughout the pre-application consultation, which has informed the design development. This is outlined in further detail in **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047].** The Applicant has also considered the impacts to soil and a detailed assessment is presented in **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2]**. A detailed response to the Written Representations from Prestons' Farms and TCS Biosciences Ltd **[REP1-133]** has been submitted by the Applicant at Deadline 2 (**Appendix 1: Response to the Written Representation received from TCS Biosciences Ltd and Preston Farm** of the **Applicant's Response to Written Representations [EN010158/APP/8.12])** to provide a clear, single document setting out the detail of the Applicant's position regarding the effects on and mitigation for these commercial operations, alongside measures to manage noise and vibration and biosecurity concerns.
Applicant Assessment, 2.5	**Agricultural Businesses** Comment noting that the impacts of both permanent and temporary removal of land from agricultural use should be	The Environmental Statement does not rely on county level statistics in isolation, and these figures do not replace the assessment of local effects.

	viewed at the local, not county level, as the quoted loss of 0.65% of the county-wide agricultural land is disingenuous.	The effects of the Proposed Development on agricultural land quality are assessed at site specific level in **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2].** **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** assesses the effects of the Proposed Development on the agricultural economy at both the Buckingham county scale and at a local agricultural business and individual landholdings scale, informed by engagement with affected landowners and tenants, and national statistics. County-level agricultural data is therefore used to provide context for scale and proportionality after local land take and to assess effects on the agricultural economy as a whole at an appropriate scale, and business-specific effects have also been identified. The assessment of agricultural land is not limited to a single figure for all agricultural land - field surveys have been used to determine ALC grades and soil types, the findings of the survey are found within **ES Volume 4, Appendix 12.1: Agricultural Land Classification Report [EN010158/APP/6.4] [APP-126],** and the use of best and most versatile (BMV) land has been minimised through the iterative design development. It is noted that only 1.51% of the entire Site is classified as BMV, which, in the wider context of solar NSIPs, is exceptionally low, as shown within **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2]**. **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** notes (at paragraph 14.8.19) that "indicatively, based on County-wide average employment per ha this would result in the reduction of the *indicative capacity* for up to around 10 FTE jobs" (emphasis added). It is further noted, to contextualise this, that (paragraph 14.8.20) "*engagement with the agricultural operators has confirmed that the actual employment supported by the agricultural land affected by construction activity is far lower than the indicative capacity, and therefore the above assessment sets a hypothetical, 'worst-case' assessment of employment capacity rather than actual net employment reduction which would be influenced by commercial agreements between the Applicant and agricultural operations affected*". Overall, it is anticipated that agricultural tenants are unlikely to be significantly affected by the Proposed Development in terms of their ability to produce economic output. As such, there is likely to be limited change to the employment supported by and activity generated by the local or regional agricultural economy, or the national agricultural economy.
Land Swaps, 2.6	**Land Swaps** Comment noting that the exchange of land, through land swaps, should consider whether a hectare to hectare basis is appropriate since this method does not imply that the alternative land is equally as suitable.	The details of the agreed heads of terms between the tenants and the Calydon Estate are confidential. The Applicant can confirm that the replacement land is contiguous to the existing agricultural holdings of each tenant. The tenants have been involved in the identification of the replacement land and the land is identified in the agreed heads of terms. It is possible that land may require works to ensure it is suitable for the intended use and this is a matter in discussion. Otherwise the Applicant is not aware of any reason why the replacement land is not suitable.
Land Swaps, 2.7 and Consequences of Granting CPO Rights, 5.3	**Land Swaps** Comment noting that Paragraph 14.6.40 of the Population Chapter of the ES states *"where appropriate, impacts on businesses as tenants are mitigated and/or compensated such that significant impacts on their operation are avoided"* and that	All agricultural tenancies and non-agricultural businesses are considered by **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** to be of high or very high sensitivity – acknowledging the importance of access to land of appropriate quality, accessibility and size to ensure the viability of the operation of agricultural tenancies and businesses. As described through the application of sensitivity and magnitude criteria in tables 14.21 and 14.22 of **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]**, and their contribution to significance assessment at table 14.2, a significant adverse effect would occur in the instance that partial removal or

	impacts on operations should be taken to be highly significant if a tenant is required to surrender their lands.	substantial amendment to access or acquisition of land compromising viability of property, businesses, community assets or agricultural holdings, and/or introduction of severe severance with limited/moderate accessibility provision, would result in a significant effect. However, the assessment considers the implications of embedded mitigation, compensation and additional mitigation which would reduce the significance to slight as a result of the provision of land swaps that reduce the potential for substantial effects on business viability.
Land Swaps, 2.8	**Agricultural Businesses** Comment querying how possible it will be for full and continued agricultural use to take place on land designated for cabling routes, as noted in the Population Chapter of the ES.	Cables exist underground across the country without interfering with the continued agricultural use. The Applicant does not consider the position to be different here. Cables will be at a depth which do not interfere with agricultural practices, as secured by the **Design Commitments [EN010158/APP/5.9.4]** for Work No. 6 and Work No. 7.
Impacts on Employment, 2.9	**Employment Benefits** Comment the importance of local agricultural businesses has been largely dismissed, and that any employment benefits would be during the construction phase and that such jobs would not benefit local people and that the operational phase jobs are limited. Further comment that this needs to be set against the loss of existing skilled employees.	The Applicant does not agree that the importance of local agricultural businesses has been largely dismissed. All agricultural tenancies and non-agricultural businesses are considered by **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** to be of high or very high sensitivity – acknowledging the importance of access to land of appropriate quality, accessibility and size to ensure the viability of the operation of agricultural tenancies and businesses. Iterative Proposed Development design, informed by engagement with affected businesses, has led to changes that reflect the importance of ensuring business viability. Additional mitigation, secured through management plans, has also been developed based on the bespoke needs of individual affected businesses and follows best practice in terms of the approach to environmental thresholds, monitoring and engagement to ensure detailed management plans are effective. Compensation and land swap agreements have also been developed in negotiation with affected tenancies - the Claydon Estate has negotiated with tenants to provide Heads of Terms for replacement land (with land already in the Claydon Estate's ownership) that it considers is equally productive, of similar size and quality, and accessible to each Tenant/Occupier, such that effects on viability of those agricultural businesses would not be adversely affected. These far exceed the provisions of compensation under the Agricultural Holdings Act 1986. It is acknowledged that the rural location of the Site, and the mobility and peripatetic nature of the construction workforce in the UK, means that the location of the construction workforce and supply chain cannot be fully known at this stage – as such it is estimated that of the gross, peak construction workforce (600 FTE jobs), around 180 FTE jobs are likely to be drawn from within the CLMA Focus Area (see **ES Volume 3, Figure 14.3: CLMA Focus Area [EN010158/APP/6.3] [APP-073]**). This area is principally focused on Buckinghamshire, however it is noted that the Proposed Development is broadly equidistant between major urban areas of Milton Keynes (Milton Keynes), Bicester (Cherwell) and Aylesbury (Buckinghamshire). As such, it is likely that the economic benefit relating to construction employment and supply chain may extend across different local authority areas. However, Buckinghamshire Council is the host authority for the Proposed Development, and the relevant planning authority responsible for approval of the detailed Employment, Skills and Supply Chain Plan (which must be in accordance with the **Outline Employment, Skills and Supply Chain Plan (Outline ESSCP) [EN010158/APP/7.14.3]**), and therefore would be able to work with the Applicant to direct measures to be secured within the Plan to the primary benefit of its residents and businesses.

		It is estimated that the operation (including maintenance) phase would support around 24 FTE jobs, with additional staff attending when required for maintenance, replacement of faulty or end of service life solar equipment, vegetation management activities and cleaning. The employment supported would include electrical engineering roles likely to require higher level skills and qualifications, as well as site management, administrative and process/elementary occupations including security and maintenance.
Impacts on Employment, 2.10 and Applicant's Conclusions, 3.3	**Employment Benefits** Comment noting that the Population Chapter of the ES estimates impact on employment in agriculture at a county-wide basis and that this misrepresents the true impact on the local level and on businesses of national importance.	The assessment within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** provides an assessment of both the economic-scale effects on the agricultural economy at a functional economic market area, and the effect on individual landholdings and tenancies in agricultural and non-agricultural sectors affected by land use and environmental change related to the Proposed Development.
Applicant's Conclusions, 3.2	**Agricultural Businesses** Comment noting that no assessment of impact to the business of Preston Farms/TCS Biosciences has been had to the wider (national) economic and health impacts lens.	The Applicant recognises the importance of TCS Biosciences Ltd as a supplier to the NHS. The Applicant has sought and had regard to feedback from businesses (including TCS Biosciences Ltd) during the pre-application period, and has amended the Proposed Development's design over that period to help to avoid, reduce and/or minimise the potential for noise and accessibility effects perceived by these businesses. A detailed response to the Written Representations from Prestons' Farms and TCS Biosciences Ltd **[REP1-133]** has been submitted by the Applicant at Deadline 2 (**Appendix 1: Response to the Written Representation received from TCS Biosciences Ltd and Preston Farm** of the **Applicant's Response to Written Representations [EN010158/APP/8.12]**) to provide a clear, single document setting out the detail of the Applicant's position regarding the effects on and mitigation for these commercial operations.
Cumulative Impacts, 4.2	**Cumulative Assessment** Comment noting that the Cumulative Effects Chapter of the ES is incomplete as it does not appear to assess the cumulative impacts on the ability to conduct an agricultural business, the impact of noise, dust, etc, on livestock or biosecurity.	A detailed cumulative effects assessment has been undertaken as presented in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]** which considers the intra-project and inter-project cumulative effects. The inter-project cumulative effects considers the interactions of environmental effects, including noise and dust at common sensitive receptors, which includes residential properties and businesses. The Applicant has committed to biosecurity measures as detailed in Table 3.2 of the **Outline CEMP [EN010158/APP/7.2.3].** A detailed response to the Written Representations from Prestons' Farms and TCS Biosciences Ltd **[REP1-133]** has been submitted by the Applicant at Deadline 2 (**Appendix 1: Response to the Written Representation received from TCS Biosciences Ltd and Preston Farm** of the **Applicant's Response to Written Representations [EN010158/APP/8.12]**) to provide a clear, single document setting out the effects on and mitigation for these commercial operations, including biosecurity measures and further detail and mitigation considering noise and vibration on livestock.
Cumulative Impacts, 4.3	**Cumulative Assessment** Comment noting that the Cumulative Effects Chapter of the ES is wrong to state *"all soils within the Order Limits have a medium resilience to damage during handling and are of*	Table 12.6: Receptor sensitivity relating to soil ecosystems in **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2],** following industry standard guidance, defines soils of low resilience as the following:

	medium sensitivity. The magnitude of impact for soil ecosystems will also be minor. Therefore, the significance of the residual effect will be slight adverse and not significant" as the clay soils in the area have low resilience to damage and are susceptible to compaction	*"- Soils with high clay and silt fractions (clays, silty clays, sandy clays, heavy silty clay loams and heavy clay loams) and organo-mineral and peaty soils where the FCD are 150 or greater; - Medium-textured soils (silt loams, medium silty clay loams, medium clay loams and sandy clay loams) where the FCDs are 225 or greater; and* - *All soils in wetness class 5 and 6 (WCV and WCVI)."* The majority of soils found within the Order Limits comprise fine loamy clayey topsoils over clayey subsoils, with sandy loam or sandy clay loam topsoil and permeable upper subsoil, overlying a dense clay at depth in some areas, as described in **ES Volume 4, Appendix 12.1: Agricultural Land Classification Report [EN010158/APP/6.4] [APP-126]**. Although there is a high clay content in much of the soil, the Field Capacity Days for the entire area within the Order Limits is 136-142 (beneath the 150 or greater required for soils with a high clay content to be considered to have low resilience), and the soils all fall into Wetness Classes (WC) II, III and IV (lower than the WC required to classify soils as low resilience). **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]** is therefore correct to state that *"all soils within the Order Limits have a medium resilience to damage".* Food security has been assessed as part of the cumulative assessment and found to be not significant as described in **ES Volume, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3].**
Consequences of Granting CPO Rights, 5.4	**Compulsory Acquisition** Comment noting that the granting of compulsory purchase rights to a Third Party (*assumed to be reference to the Applicant*) raises questions about the future safeguarding of the land, the restriction on the land's usage and the prospects of the land returning to agricultural usage after decommissioning.	The Applicant recognises the importance of agricultural land use in the region and confirms that low-quality agricultural land has been prioritised for the Proposed Development – with only 1.51% of the Site considered to be BMV land which, in the wider context of solar NSIPs, is exceptionally low. Land use will change within parts of the Order Limits from agricultural use during the construction phase through to the operation (including maintenance) phase to support the Proposed Development. However, it should also be noted that normal agricultural use (e.g. arable and/or grazing as current) would continue (except for the cable installation and access track construction) in Work Nos 2B, 6, 7 and 10B (**Works Plans [EN010158/APP/2.3.3] [REP1-005]**) (all areas outside of main developable Parcels). The Applicant notes, however, that upon decommissioning, all soils within the Order Limits would be reinstated to their pre-construction condition as secured in the **Outline Soil Management Plan [EN010158/APP/7.7.3]** and Requirement 17 of the **Draft Development Consent Order (DCO) [EN010158/APP/3.1.4]** meaning it would be capable of agricultural production and the relevant landowner may seek agricultural tenants on the re-instated land. This commitment is also secured in the **Outline Decommissioning Environmental Management Plan (Outline DEMP) [EN010158/APP/7.4.2] [REP1-082]** and Requirement 18 of the **Draft DCO [EN010158/APP/3.1.4]**. The **Outline DEMP** also provides that soil reinstatement activities will be audited against the requirements of the DEMP(s) and the Soil Management Plan (required by Requirements 17 and 18 of the draft DCO) by the Principal Contractor. Accordingly, the Applicant considers that there are appropriate safeguards in the **Draft DCO [EN010158/APP/3.1.4]** to facilitate a return to agricultural use within the Order Limits post-decommissioning.
Consequences of Granting CPO Rights, 5.7	**Compulsory Acquisition**	EDF power solutions (formerly EDF Renewables Ltd), which is the majority shareholder of Rosefield EnergyFarm Limited, has significant experience with rural land management as it currently owns and

	Comment querying the Applicant's ability to suitably act as a custodian of the land across all phases of the Proposed Development with regard for economic and heritage impacts.	operates 50 operational renewables sites in the UK (including solar, wind and BESS). EDF has a dedicated Asset Operations team which includes environmental specialists with a wealth of experience in land management. In addition, the DCO Application contains detailed measures regarding management and monitoring of soils, biodiversity, landscape, and other aspects of land management. The Applicant considers that the legally binding controls set out in the suite of management plans are more detailed and onerous than the standard environmental regulations which agricultural operations are expected to comply with.

Table 3-3: Buckinghamshire Council [REP1-111]

Ref	Para. Ref.	Topic Matter and Summary of Position	Applicant's Response
3.1	Ecology, Page 5	**Ecology** Comment noting cumulative effects with HS2, East West Rail, solar/BESS schemes under-assessed, despite overlapping ecological constraints. Further comment noting the remedy would be for the Applicant to provide a detailed monitoring strategy, covering bats, ground-nesting birds, and wider farmland bird assemblages.	**ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]** fully assesses the potential for intra cumulative impacts to occur from the Proposed Development and for inter cumulative from other developments including High Speed 2, East West Rail, solar/BESS schemes in combination with the Proposed Development. Where the assessment has concluded that there is the potential for cumulative effects, this has been flagged, with a *potentially* significant inter-project cumulative residual effect identified for Bechstein's bats as these projects fall within the Core Sustenance Zone (CSZ) of Bechstein's bats, and inter-project cumulative residual effects are anticipated if Bechstein's bats are displaced from extensive areas of their CSZ. No additional mitigation has been flagged as required, as mitigation measures for the Proposed Development are considered likely to maintain foraging and commuting habitat for bat species. A detailed monitoring strategy is outlined within the **Outline LEMP [EN010158/APP/7.6.3]**, confirming that monitoring of bat activity would be undertaken during the operation (including maintenance) phase to confirm the expected effectiveness of the embedded mitigation and the effect of the Solar PV modules and associated infrastructure on bats. The structure of the bat monitoring strategy will follow that outlined in Ch9 of the Bat Mitigation Guidelines[1]; this requires meaningful objective, specific tests of those objectives and remedial actions to be specified. The **Outline LEMP [EN010158/APP/7.6.3]** outlines a suite of mitigation measures designed to benefit ground nesting birds and non-ground nesting birds that form part of the farmland bird assemblage along with a commitment to undertaking a monitoring programme for breeding bird species would include all farmland bird species not just ground nesting ones, which would be secured by the Requirement 7 of the **Draft DCO [EN010158/APP/3.1.4]**, that would be submitted to and approved by the relevant planning authority.
3.2	Ecology, Page 5	**Ecology** Comment requesting that artificial lighting is avoided in all sensitive parcels and secure a strict dark-sky strategy is implemented.	There would be no permanent (continuous) lighting for security purposes except for at emergency exits located at the Rosefield Substation and BESS Compound. Security lighting would use infra-red sensors which is not on the visible spectrum. Details of lighting design to limit effects on sensitive receptors is secured in the **Design Commitments [EN010158/APP/5.9.4]**, and the **Outline CEMP [EN010158/APP/7.2.3]**. The CCTV is also based on infra-red and therefore Solar PV development would not be continuously lit by visible lighting and wildlife will not be able to see it. Consideration has been given to minimise light spill to prevent disturbance to sensitive receptors. Throughout construction and operation, the use of motion detection or manually operated lighting would be used to avoid constant lighting as set out and secured with the **Outline CEMP [EN010158/APP/7.2.3].**
3.3	Population and Human Health, Page 9 and 10	**Population and Human Health** Comment noting that the DCO Application lacks demographic analysis and does not identify vulnerable or high-exposure groups,	The Health Effects Report (Annex A to **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3]**) includes appropriate demographic analysis to identify those sub-populations likely to experience differential or disproportionate effects related to the determinants of health which have the potential to be affected by the Proposed Development.

[1] Reason, P.F. and Wray, S. (2025). UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Version 1.2. Chartered Institute of Ecology and Environmental Management, Ampfield.

		needed to understand differential health effects, particularly for receptors closest to the BESS and construction routes. Further comment noting the remedy would be to identify vulnerable groups and receptors most sensitive to noise, traffic, dust, landscape change and loss of access.	Section 5 of the Health Effects Report provides a detailed health and wellbeing baseline – including demographic characteristics – which identifies the prevalence of potentially vulnerable sub-populations and recognises their sensitivity, which is then applied in the consideration of effects on health and wellbeing in Section 7.
3.4	Population and Human Health, Page 10	**Population and Human Health** Comment noting that the potential for increased stress, anxiety and loss of amenity, especially for residents near construction routes and PRoWs adjacent to the BESS. Further comment noting the remedy would be to include mitigation for community amenity, such as avoiding peak school hours for HGV movements and improving PRoW accessibility; and provide a complaints and rapid-response mechanism for residents during construction and operation.	The assessment within **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3]** includes consideration of the close relationship between mental health and wellbeing including anxiety and stress with the experience of environmental amenity. There are a number of commitments to mitigation to address this which are set out in this context within the **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3]** – including: • Commitments to limiting accessibility changes during the construction phase, and implementing improvements to public rights of way (PRoW) and permissive paths during the construction phase for the operational (including maintenance) phase, secured by management plans and explained in detail at Section 3.3 and Section 7.4 of the Health Effects Report (Annex A to **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3]**). • Commitments to on-going engagement including the provision of information and a clear, responsive complaints and rapid response mechanism secured by management plans as detailed in Section 3.3 of the Health Effects Report (Annex A to **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3]**). Commitments to restricting HGV traffic and construction deliveries related to the Proposed Development are set out within the **Outline Construction Traffic Management Plan (Outline CTMP) [EN010158/APP/7.5.3]** and include that (paragraph 3.2.2) "*wherever possible, HGV deliveries will avoid school opening and closing times during term time so as not to disrupt journeys to and from school. Term times and hours for East Claydon School, Quainton CoE Combined School, Furze Down School, Sir Thomas Freemantle School and Grendon Underwood Combined Schools will be obtained and advised to the Principal Contractor*".
3.5	Population and Human Health, Page 10	**Population and Human Health** Comment noting limited analysis of temporary construction effects, including dust, HGV noise, vibration and disruption to daily movement patterns. Further comment noting the remedy would be to provide clear assessment of construction-phase exposures (dust, HGV movements, vibration, temporary diversions, noise)..	The effects of temporary environmental and access changes during the construction phase have been considered in terms of health pathways within **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3]** and are most clearly set out within Section 7 'Assessment of Health Effects' within Annex A (Health Effects Report).
3.6	Population and Human Health, Page 10	**Population and Human Health** Comment noting that health impacts of severance for communities reliant on PRoW networks for recreation and mental wellbeing are not addressed, and that that there is no clear assessment of how access to green space, tranquillity, or recreational walking routes will be affected.	The potential for changes in traffic, transport and access (including access to the natural environment for active recreation) are clearly set out in terms of health pathways within Section 7.4 of the Health Effects Report – Annex A to **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3].** That assessment recognises that access to and experience of the natural environment including via PRoW (recreational walking routes) is very important to physical and mental wellbeing.

		Further comment noting the remedy would be to clarify how the development will maintain or improve access to recreation, green space and safe walking routes during construction.	Within this section, clear reference is made to mitigation secured to maintain or improve access to recreation, green space and safe walking routes during construction via the **Outline CTMP [EN010158/APP/7.5.3]** and the **Outline Rights of Way and Access Strategy (Outline RoWAS) [EN010158/APP/7.8.3]**.
3.7	Population and Human Health, Page 10	**Population and Human Health** Comment requesting the Applicant to improve mitigation for operational noise around the BESS where significant effects may arise from low background levels by committing to an updated package of mitigation in the OEMP to ensure ongoing protection of health and wellbeing throughout the 40-year operational period.	Following concern raised by Buckinghamshire Council and members of the community relating to the monitoring and communication of noise impacts, at Deadline 1 the Applicant revised the **Outline Operational Environmental Management Plan (Outline OEMP) [EN010158/APP/7.3.3]** to add commitments to monitoring and reporting. While operational noise is not considered to be likely to be significant, this commitment is important in health terms to demonstrate and provide accountability for the potential or perception of effects. In summary these commitments to monitoring include: • Noise measurements of the installed operational equipment will be undertaken to verify that noise levels at source align with values used within the noise prediction model prepared at the detailed design stage. • The noise monitoring process would be undertaken on a cyclic basis at an interval agreed with the Environmental Health department at Buckinghamshire Council. • The resultant dataset would be used to verify that the noise emissions have not increased over time, at a magnitude that could result in significant adverse effects. • If the noise monitoring demonstrates that the source levels are higher than those used to inform the noise prediction model, an appropriate mitigation strategy will be developed to ensure that the resultant noise levels do not exceed the adopted criteria of 40 dB LAr daytime and 35dB LAr night-time at high sensitivity receptors, as secured by a Requirement in Schedule 2 of the **Draft DCO [EN010158/APP/3.1.4]**. The revised **Outline OEMP [EN010158/APP/7.3.3]** also includes commitments to ensure a clear, transparent and effective complaints procedure for noise effects. In the event of a noise related complaint being received during the operational (including maintenance) phase, the following procedure would typically be adopted: • Community Liaison Officer to log noise complaint and advise complainant on the steps that will be taken, and to notify the Environmental Health department at Buckinghamshire Council. • Representative of the Applicant will carry out an inspection of noise emitting equipment in the locality of the complainant property. • Complete remedial works if necessary and validate the effectiveness of these works – if the source levels remain higher than those used to inform the noise prediction model, an appropriate mitigation strategy will be developed to ensure that the resultant noise levels do not exceed the adopted criteria of 40 dB LAr daytime and 35 dB LAr night-time at high sensitivity receptors, as secured by a Requirement in Schedule 2 of the **Draft DCO [EN010158/APP/3.1.4]**. • Communicate details of the noise complaint and the remedial actions that have been taken. A consideration of these measures was incorporated into the assessment of potential effects on health and wellbeing within the **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3]** submitted at Deadline 1.

3.8	Highways and Transport, Page 11	**Highways and Transport** Comment noting concerns over cumulative construction traffic with HS2 and East West Rail, where coordinated routing and timing are essential.	A **Draft Statement of Common Ground with High Speed 2 Limited [EN010158/APP/5.19]** [REP1-030] was submitted at Deadline 1 following this request from Buckinghamshire Council. The Statement of Common Ground agrees that the Applicant will engage with HS2 on transport management measures through the existing traffic forums.
3.9	Public Rights of Way, Page 12	**Public Rights of Way** Comments noting that diversions create dead ends and right-angle bends, do not meet minimum standards of 2m for footpaths, outstanding information in relation to diversions near Pond Farm and missed opportunities to address existing network issues, including improved accessibility measures. Further comment noting the remedy would be to provide final diversion drawings for land north-west of Pond Farm and other outstanding locations, secure a minimum 2m width and deliver positive enhancements.	The **Streets, Rights of Way and Access Plans [EN010158/APP/2.4.3]** [REP1-006] and **Outline RoWAS [EN010158/APP/7.8.3]** were updated at Deadline 1 to show the amended diversion proposals around Ponds Farm and correct the dead end. The **Outline RoWAS [EN010158/APP/7.8.3]** has been further updated at Deadline 2 to secure a minimum 2m width for PRoW diversions, following a survey to ensure that this does not result in hedgerow removals at existing gaps in hedgerows or other width restrictions caused by gates or stiles. Reference has also been added in the updated **Outline RoWAS [EN010158/APP/7.8.3]** to a survey of existing stiles within the Order Limits and consideration of their upgrade to accessible gates in the detailed Rights of Way and Access Strategy submitted for approval if the DCO is consented. No additional link between Knowl Hill and Knowhill Farm is provided as part of the land that this link would cross is within an area only required to be used by the Applicant for cabling and/or construction and maintenance access. This area would be returned to agricultural use following construction, and the additional link is not considered necessary to mitigate the effects of the Proposed Development. As the Applicant set out on page 78-79 of the **Applicant's Response to Relevant Representations [EN010158/APP/8.3]** [PDA-006], the Applicant is not proposing to upgrade footpath ECL/8/2 (SCL/8/2 in the Local Impact Report is a typo) to a bridleway. However, consideration is being given to the potential for creating a bridleway link in this vicinity that would be accessible to the public during the operation (including maintenance) phase and will be discussed further with Buckinghamshire Council.
3.10	Public Rights of Way, Page 12	**Public Rights of Way** Comment noting insufficient assessment of PRoW amenity impacts, particularly where routes pass close to solar arrays or the BESS. Comment noting a failure to identify or mitigate loss of openness, tranquillity and rural character experienced by users. Further comment noting the remedy would be to enhance amenity through wider mitigation: set back panels, avoid over-enclosure and maintain local rural character.	The Applicant considers that the design of the Proposed Development has taken into consideration users of the PRoW network. The text and figures within Section 6 of the **Design Approach Document [EN010158/APP/5.8.2]** [REP1-018] relating to 'Project Principle 2.3: Consider sequential views and the experience of people using the local network of Public Rights of Way and recreational routes, Calvert Road, Claydon Road and other local roads' and Project Principles 9.1 to 9.4 under 'Strategic Principle 9 - Provide new ways to enjoy the countryside' provide a level of rationale for these offset distances. The offsets for PRoW were informed by a number of factors. This has included consideration of the width of minimum offsets utilised at other DCO solar farms, consideration of guidance such as The British Horse Society's 2025 'Advice on solar farms near routes used by equestrians' with its recommended minimum clear width of 4m from Solar PV development/a 5m minimum corridor, testing of the character and feel of the corridors created by the offsets using illustrative cross sections such as Figures 6.5 and 6.17-6.19 of the **Design Approach Document [EN010158/APP/5.8.2]** [REP1-018], and assessment of the effects for users of the PRoW within **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]**. The Applicant is therefore confident that these offsets provide the necessary mitigation to avoid over-enclosure and sufficient set-back from solar PV development. During the operation (including maintenance) phase, noise from equipment installations associated with the Proposed Development would be heavily mitigated, including use of low-noise units and

			acoustic barriers as set out and secured in the **Outline CEMP [EN010158/APP/7.2.3]** and **Design Commitments [EN010158/APP/5.9.4]**. Perceptible sound from the Proposed Development would be attributable to items of noise-generating infrastructure which are localised in the context of the wider Order Limits and PRoW network. PRoWs are by their nature transitory in use, with people typically not staying in a given location for a prolonged period of time. As a result, the change in noise relative to the prevailing ambient sound levels along the PRoW network would be limited and therefore significant adverse effects would not be expected as set out in **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2]** [REP1-040]. **Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** has considered the potential contribution of noise effects on recreational amenity and it is considered that the limited and not significant levels of effect ascribed to noise impacts would not further increase the levels of effect on footpath users in the Order Limits.
3.11	Noise and Vibration, Page 13	**Noise and Vibration** Comment requesting that the Outline CEMP is strengthened with controls on working hours, plant specifications, routeing and restrictions during sensitive times (e.g. school peaks).	The **Outline CEMP [EN010158/APP/7.2.3]** sets out the working hours to be adhered to during the construction phase (Section 2.5 refers), including the process to be followed for any out of hours working. Specific plant specifications are not defined at this outline stage, however, this information can form part of the detailed Construction Environmental Management Plan at the appropriate stage. The **Outline CTMP [EN010158/APP/7.5.3]** includes details on routing of construction traffic and the timing of HGV deliveries including the avoidance of schools opening/closing periods.
3.12	Noise and Vibration, Page 13	**Noise and Vibration** Comment noting that temporary construction compounds and haul routes risk localised spikes in noise are not fully assessed. Further comment noting the remedy would be to provide a commitment to avoid construction-phase activities that generate high noise during early morning, evenings or weekends.	An appropriate assessment of construction induced noise levels has been undertaken which is presented in **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2]** [REP1-040]. Following the implementation of mitigation measures, no significant effects are predicted. The **Outline CEMP [EN010158/APP/7.2.3]** sets out the working hours to be adhered to during the construction phase (Section 2.5 refers), including the process to be followed for any out of hours working. The commitment to control noise further during the early morning and evening has also been addressed within the **Outline CEMP** as between 07:00 - 08:00 and 18:00 - 19:00 Monday to Friday and 07:00 – 08:00 on Saturdays, noisier activities (such as piling) would be restricted depending on the construction activity proposed to take place and its proximity to sensitive receptors. Further detail is outlined in Section 2.8 of the **Outline CEMP [EN010158/APP/7.2.3].**
3.13	Noise and Vibration, Page 13	**Noise and Vibration** Comment noting that increased traffic on narrow rural lanes risks noise and vibration impacts on sensitive properties. Further comment noting the remedy would be to provide detailed routing, HGV timing and traffic noise modelling integrated with highways assessment.	Construction traffic has been routed to avoid existing villages and towns as far as practicable, with the intention of minimising potential disturbance experienced by occupants of sensitive roadside receptors. The **Outline CTMP [EN010158/APP/7.5.3]** includes details on routing of construction traffic and the timing of HGV deliveries associated with the construction phase. **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2]** [REP1-040] incorporates a road traffic noise assessment. No significant effects are predicted.
3.14	Noise and Vibration, Page 14	**Noise and Vibration** Comment requesting evidence that operational noise will not degrade over time through maintenance schedules and replacement protocols.	To address the potential for noise increases over time, the **Outline OEMP [EN010158/APP/7.3.3]** includes the following commitment: *"Noise measurements of the installed operational equipment will be undertaken to verify that noise levels at source align with values used within the noise prediction model prepared at the detailed design stage. For the site-wide inverters, this would be based on a representative sample of units. The noise monitoring process would be undertaken on a cyclic basis at an interval agreed with the*

			Environmental Health department at Buckinghamshire Council. The resultant dataset would be used to verify that the noise emissions have not increased over time, at a magnitude that could result in significant adverse effects. *If the noise monitoring demonstrates that the source levels are higher than those used to inform the noise prediction model, an appropriate mitigation strategy will be developed to ensure that the resultant noise levels do not exceed the adopted criteria of 40 dB LAr daytime and 35 dB LAr night-time at high sensitivity receptors, as secured by a Requirement in Schedule 2 of the Draft DCO [EN010158/APP/3.1.3].”*
3.15	Noise and Vibration, Page 14	**Noise and Vibration** Comment requesting the relocating of the BESS close to East Claydon substation.	Locating the BESS close to the National Grid East Claydon Substation has the potential to cause significant adverse noise effects at Sion Hill Farm during the operation (including maintenance) phase of the Proposed Development. This would be a function of: • the reduced separation distance to Sion Hill Farm (including fields used by livestock), relative to the current location; • the resultant increase in noise emitting infrastructure within Parcel 3, that would result in higher noise levels at Sion Hill Farm; and • the inter-project cumulative effects with other developments in the vicinity of Parcel 3, including the National Grid East Claydon Substation Extension and the East Claydon BESS.
3.16	Land and Groundwater, Page 15	**Land and Groundwater** Comment noting that there is an incomplete understanding of how earthworks, drainage changes and cabling may affect soil hydrology and groundwater movement. Further comment noting the remedy would be to commit to trenchless techniques or low-impact methods where cabling crosses sensitive hydrological areas.	Further understanding of the groundwater regime will be gained following receipt of the results of the ground investigation (secured within the **Outline CEMP [EN010158/APP/7.2.3]**). If any remediation works or additional mitigation measures are deemed to be required as a result of the findings, these further requirements will be discussed and agreed with Buckinghamshire Council and consulted on with the Environment Agency), as secured within the **Outline CEMP [EN010158/APP/7.2.3]**. The potential need for the use of trenchless techniques or low-impact methods where there are sensitive hydrological areas will be discussed after receipt of ground investigation results, if appropriate.
3.17	Land and Groundwater, Page 15	**Land and Groundwater** Comment noting that there is a reliance on generic embedded mitigation without site-specific justification, increasing uncertainty about actual risk levels. Further comment noting the remedy would be to produce a strengthened CEMP, covering: • excavation and soil-handling protocols • contamination control • spill prevention • emergency response procedures for hazardous substances	The detailed Construction Environmental Management Plan will include further specifics relating to preventing contamination, and as defined in the **Outline CEMP [EN010158/APP/7.2.3]**, this will cover the issues of excavation works, contamination control, spill prevention and emergency response. Further information on soil-handling protocols will be covered within the detailed Soil Management Plan. The Applicant notes that these measures are generic in the sense that they apply to the entire Proposed Development area, but that does not mean that they are not robust and comprehensive in terms of protecting groundwater. The mitigation measures relating to the protection of groundwater will be protective of the highest sensitivity groundwater, as well as areas of lower sensitivity. It is secured within the **Outline CEMP [EN010158/APP/7.2.3]** that after receipt of the results of the ground investigation, any further requirements for remediation or additional mitigation measures will be discussed with and agreed by Buckinghamshire Council and consulted on with the Environment Agency.

3.18	Land and Groundwater, Page 15	**Land and Groundwater** Comment noting that there is limited assessment of land instability risks, including settlement, compaction, or excavation impacts across clay soils.	The Applicant will be obtaining information relating to geotechnical properties of the ground as part of the ground investigation works that will be undertaken prior to construction commencing (as secured within the **Outline CEMP [EN010158/APP/7.2.3]**), and this will ensure that the design calculations for all the elements of the Proposed Development infrastructure will be appropriate to the recorded ground conditions. The result of the review of the geotechnical information and appropriate design of infrastructure will be to ensure that risks to the Proposed Development from land instability (including settlement, compaction or effects relating to clay soils) are minimised.
3.19	Land and Groundwater, Page 15 and 16	**Land and Groundwater** Comment noting that decommissioning impacts not clearly defined, introducing uncertainty about future excavation risks and contamination mobilisation. Further comment noting the remedy would be to demonstrate how decommissioning will avoid disturbance of any contamination, including safe removal of infrastructure and reinstatement of soils.	Further details will be incorporated into the detailed Decommissioning Environmental Management Plan, to provide mitigation measures to protect land and groundwater receptors from potential adverse effects associated with the decommissioning works. The **Outline DEMP [EN010158/APP/7.4.3]** includes mitigation measures to avoid disturbance of existing contamination and to avoid introducing new contamination, and further details will be presented in the detailed version of this document. The soil reinstatement element of works will be managed by the **Outline Soil Management Plan [EN010158/APP/7.7.3]**, and the careful management of materials will ensure that there is no cross-contamination of stockpiled topsoil or subsoil with any other materials, prior to reinstatement.
3.20	Land and Groundwater, Page 16	**Land and Groundwater** Comment requesting that controls are introduced to prevent construction or decommissioning works from occurring in areas at risk of groundwater ingress.	The **Outline CEMP [EN010158/APP/7.2.3]** and the **Outline Battery Safety Management Plan (Outline BSMP) [EN010158/APP/7.9.3]** include measures to protect groundwater from contamination or impacts on quantity/flow regime. The **Outline Drainage Strategy [EN010158/APP/7.11.3]** includes measures to mitigate against potential effects of groundwater flooding on the Proposed Development infrastructure, and measures that will be integrated into the design (for example at the BESS) to ensure there is no adverse impact on the Proposed Development as a result of groundwater flooding.
3.21	Land and Groundwater, Page 16	**Land and Groundwater** Comment noting that potential cumulative effects with nearby major infrastructure (HS2, EWR, National Grid works) not fully assessed in relation to groundwater and land quality. Further comment noting the remedy would be to provide a cumulative assessment showing interaction with HS2 earthworks, EWR drainage changes, and other local infrastructure.	The Applicant has undertaken a detailed cumulative assessment considering land and groundwater which is provided in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3].** As detailed in Table 17.2, the assessment on inter-project land and groundwater cumulative effects is based on a 1km buffer which is considered to be appropriate to identify land and groundwater related receptors that could be impacted by the construction, operation (including maintenance) and/or decommissioning of the Proposed Development. The Applicant has also ensured that sufficient measures are in place to mitigate groundwater and land quality impacts. These measures are detailed and secured in the **Outline CEMP [EN010158/APP/7.2.3], Outline OEMP [EN010158/APP/7.3.3], Outline DEMP [EN010158/APP/7.4.3]** and **Outline Drainage Strategy [EN010158/APP/7.11.3]**.
3.22	Flood Risk and Drainage, Page 16	**Flood Risk and Drainage** Comment noting that insufficient assessment of run-off pathways across large areas of hard/compacted ground created during construction. Further comment noting the remedy would be to supply detailed construction phase drainage plans, addressing: • stockpile control • silt management	Details of the construction phase drainage plans are outlined in the **Outline Drainage Strategy [EN010158/APP/7.11.3]** and will be secured through Requirement 9 of the **Draft DCO [EN010158/APP/3.1.4].**

		• temporary run-off pathways • protection of nearby woodland and hedgerow bases	
3.23	Flood Risk and Drainage, Page 17	**Flood Risk and Drainage** Comment noting incomplete information on the existing land drainage network (field drains, culverts, ditches), making impacts on downstream receptors unclear. Further comment noting the remedy would be to provide maintenance and inspection schedules for all drainage features, secured through the OEMP/LEMP.	The Applicant can confirm that there will be no new culverting required for existing watercourses or drainage ditches across the Site. Where necessary, the existing culverts may need to be replaced/maintained if access tracks are situated across them. Following ongoing engagement with the Environment Agency, the Applicant has agreed to install a clear span bridge over the Claydon Brook to facilitate abnormal indivisible load (AIL) access to Parcel 3. This is set out in the **Draft Statement of Common Ground with Environment Agency [EN010158/APP/5.15.2]** and secured within the **Design Commitments [EN010158/APP/5.9.4].** Land drainage system which are damaged would either be reinstated or diverted to ensure that there would be no lasting impact from the baseline as outlined in the **Outline CEMP [EN010158/APP/7.2.3].**
3.24	Flood Risk and Drainage, Page 17	**Flood Risk and Drainage** Comment noting potential cumulative effects with HS2 and EWR drainage systems, which already alter hydrology in the Claydon and Calvert landscape. Further comment noting the remedy would be to provide a clear decommissioning drainage strategy, showing how removal of infrastructure will avoid hydrological disruption.	Sites identified within the cumulative assessment have been shown to have negligible impact on the hydrology subject to incorporation of suitable drainage schemes. The **Outline Drainage Strategy [EN010158/APP/7.11.3]** includes measures to mitigate impacts of the Proposed Development and the **Outline DEMP [EN010158/APP/7.4.3]** will include a drainage strategy to ensure any impact will be mitigated during the decommissioning phase.
3.25	Flood Risk and Drainage, Page 17	**Flood Risk and Drainage** Comment noting that there is uncertainty about how decommissioning will avoid ground disturbance, soil upheaval, and drainage interference near sensitive features.	The **Outline DEMP [EN010158/APP/7.4.3]** includes measures to protect against ground disturbance, soil upheaval, and drainage interference and further detail will be included in the detailed Decommissioning Environmental Management Plan which will be submitted to the local planning authority for approval prior to the decommissioning phase.
3.26	Air Quality, Page 18	**Air Quality** Comment noting that insufficient detail on potential impacts on residential properties, PRoW users and ecological receptors close to construction areas. Further comment noting the remedy would be to strengthen the CEMP to include: • wheel-washing • road-sweeping • dampening and stockpile controls dust monitoring stations on site boundaries.	A detailed air quality assessment has been undertaken and is provided in **ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2] [APP-049]** and **ES Volume 4, Appendix 6.1: Air Quality Assessment [EN010158/APP/6.4] [APP-086].** Table 3.6: Land and groundwater of the **Outline CEMP [EN010158/APP/7.2.3]** includes a commitment to wheel washing, road sweeping and commitment to manage stockpiles including batter or sheeting them to reduce dust.
3.27	Air Quality, Page 18	**Air Quality** Comment noting that there is limited information on HGV emissions, including frequency, routing and peak-hour movements. Further	**ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131]**,detail the construction traffic flows and access route from the A41.

		comment noting the remedy would be to commit to real-time dust monitoring at sensitive points, with action thresholds and reporting.	HGV traffic will be controlled by **Outline CTMP [EN010158/APP/7.5.3]** which includes measures to ensure that HGV traffic only uses the approved access route. Table 3.1 of **Outline CEMP [EN010158/APP/7.2.3]** includes a commitment for dust monitoring. The dust deposition, dust flux or real-time PM10 continuous monitoring locations will be agreed with the local planning authority. Continuous dust monitoring results will be shared with Buckinghamshire Council on a three monthly basis.
3.28	Air Quality, Page 18	**Air Quality** Comment noting that there is no clear link between predicted dust/emissions and mitigation triggers within the CEMP. Further comment noting the remedy would be to provide HGV movement data and ensure dust/air quality assessment reflects realistic peak construction activity.	HGV traffic will be controlled by **Outline CTMP [EN010158/APP/7.5.3]** which includes measures to ensure that HGV traffic only uses the approved access route. This includes a commitment at paragraph 4.3.2 to use GPS trackers in regular bulk material delivery HGV. Table 3.1 of **Outline CEMP [EN010158/APP/7.2.3]** includes a commitment for dust monitoring. The dust deposition, dust flux or real-time PM10 continuous monitoring locations will be agreed with the local planning authority. Continuous dust monitoring results will be shared with Buckinghamshire Council on a three monthly basis.
3.29	Air Quality, Page 18	**Air Quality** Comment noting that cumulative construction effects with HS2 and East West Rail not fully assessed. Further comment noting the remedy would be to include cumulative assessment with HS2/EWR traffic and construction timelines.	The Applicant has undertaken a detailed cumulative assessment considering air quality which is provided in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3].** As detailed in Table 17.2, the assessment on inter-project air quality cumulative effects is based on the Institute of Air Quality Management (IAQM) construction dust guidance [Ref.17-10], the study area for sensitive human receptors for demolition, earthworks and general construction activities is up to 250m from the Order Limits. For trackout activities, the study area is up to 50m from the edge of the road likely to be affected by trackout. The study area for sensitive ecological receptors for demolition, earthworks and general construction activities is up to 50m from the Order Limits. The Applicant has also ensured that sufficient measures are in place to mitigate air quality impacts. These measures are detailed and secured in the **Outline CEMP [EN010158/APP/7.2.3], Outline OEMP [EN010158/APP/7.3.3]** and **Outline DEMP [EN010158/APP/7.4.3].** The Applicant has prepared a detailed review of construction traffic effects and these are detailed in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131].** Mitigation measures to ensure the safety and efficiency of the local road network are detailed in **Outline CTMP [EN010158/APP/7.5.3].** The construction phase traffic effects of the Proposed Development are temporary and not significant. As such, the disruption to the road users is not significant, will not adversely impact emergency service access nor the ability for residents to access health care.
3.30	Air Quality, Page 18	**Air Quality** Comment noting that all air quality mitigation measures should be secured through the OEMP/CEMP to ensure enforceability.	Air quality mitigation is secured in Table 3.1 of **Outline CEMP [EN010158/APP/7.2.3]** and Table 3.1 of **Outline OEMP [EN010158/APP/7.3.3].**
3.31	Socio-economics, Page 18	**Socio-economics** Comment that the assessment does not quantify local employment benefits, nor distinguish between local, regional and national labour supply.	**ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** sets out an assessment of the likely employment effects at appropriate labour market scales, applying industry standard guidance to consider additionality (including local retention of employment benefits) and supply chain effects. This assessment includes estimates of the number and duration of construction workforce opportunities.

		Further comment that the remedy would be to provide a strengthened Socio-economic Assessment, quantifying: • local vs regional employment benefits • supply chain opportunities within Buckinghamshire • construction workforce numbers and duration	
3.32	Socio-economics, Page 18	**Socio-economics** Comment that there is a limited understanding of effects on local businesses, especially those dependent on rural tranquillity. Further comment that a remedy to this would be to undertake detailed assessment of impacts on local businesses, particularly farms, equestrian centres, tourism operators and rural enterprises.	**ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** also considers the potential for environmental and access change to affect the viability and operation of other agricultural and non-agricultural businesses in proximity of the Site. Effects on non-agricultural businesses are reported to be temporary or permanent and at most slight adverse during construction and temporary but long-term and at most slight adverse during operation (for Prestons' Farm / TCS Biosciences Ltd, Claydon House and Hogshaw Farm and Wildlife Park), resulting in an overarching non-significant effect. This is also influenced by mitigation via commercial agreements (including land swap - with heads of terms with all relevant tenants and landowners having been agreed), in addition to the implementation of embedded and additional mitigation reported in **ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2] [APP-049], ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2] , ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2], ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040]** and **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058].**
3.33	Socio-economics, Page 18	**Socio-economics** Commet that there is no detailed assessment of impacts on agricultural productivity, given 647 ha removed from use for 40 years. Further comment that a remedy to this would be to provide a full analysis of agricultural displacement, including compensation, alternative land strategies, and long-term economic loss	Overall, the temporary land-take at the Site during the 30-month construction phase would result in up to 677ha being taken out of agricultural use – equivalent to 0.65% of agricultural land in Buckinghamshire being taken out of agricultural use for the construction and operation (including maintenance) phases, which would initiate during the construction phase. The extent of BMV land take has been minimised through site selection, as highlighted in the **Design Approach Document [EN010158/APP/5.8.2] [REP1-018].** The Order Limits comprise 10.2ha of BMV land of Grades 2 and 3a quality, with the remainder of the land being non-BMV Grade 3b quality and non-Agricultural land (See Table 12.3: ALC grades within the Order Limits in **ES Volume 2, Chapter 12: Soil [EN010158/APP/6.2.2]**). The indicative effects on the agricultural economy within Buckinghamshire are set out within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** based on the application of employment land ratios across the sector, concluding that indicatively, the Proposed Development would result in the temporary, long-term reduction of the indicative capacity for up to around 10 FTE jobs, and temporary, short-term reduction of the indicative capacity for up to around 5 FTE jobs (total agricultural employment in Buckinghamshire is estimated at approximately 2,237 FTE jobs) during the construction phase. Engagement with the agricultural operators has confirmed that the actual employment supported by the agricultural land affected by construction activity is far lower than the indicative capacity, and therefore the above assessment sets a hypothetical, 'worst-case' assessment of employment capacity rather than actual net employment reduction which would be influenced by commercial agreements between the Applicant and agricultural operations affected.

			ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2] sets out the approach to assessing impacts, in the context of mitigation, on the existing freehold and leasehold/tenanted interests within the Order Limits, and identifies the specific changes in land access to be experienced in these cases.
3.34	Socio-economics, Page 18	**Socio-economics** Comment that there is a lack of clarity on how construction traffic, noise and PRoW diversions may affect tourism, recreation and community wellbeing. Further comment that a remedy to this would be to include an assessment of how PRoW disruption and landscape change affect recreational value, tourism use and rural wellbeing.	**ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** reports – where relevant – the potential for environmental change causing the potential for significant adverse effects to facilities and assets that contribute to the draw and experience of tourists in the local area, contributing to the value and volume of the wider tourist economy. Effects that may influence the tourist economy and its components relate to: • Visual effects, noise, vibration, air quality effects experienced by people during the temporary construction phase; and • Where construction activities in the area could reduce accessibility or present physical obstructions to recreational and tourist facilities including accommodation, natural and cultural heritage, PRoW and tourist attractions. The Applicant recognises that construction traffic, noise, changes to PRoW and other environmental amenity relating to PRoW users can have an impact on community [health and] wellbeing, and this is considered within **ES Volume 4, Appendix 5.5: Health and Wellbeing Summary Statement [EN010158/APP/6.4.3]** – please refer specifically to Section 7.4 of Annex A (Health Effects Report).
3.35	Socio-economics, Page 18	**Socio-economics** Comment that there is insufficient consideration of impacts on local service providers, including pressure on road networks that underpin local trade. Further comment noting the remedy would be to provide mitigation for construction-phase disruption (e.g., scheduled delivery hours, seasonal protection for visitor businesses such as Hogshaw Farm).	The Applicant has prepared a detailed review of construction traffic effects and these are detailed in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2] [APP-058]** and **ES Volume 4, Appendix 15.1: Transport Assessment [EN010158/APP/6.4] [APP-131].** Mitigation measures to ensure the safety and efficiency of the local road network are detailed in **Outline CTMP [EN010158/APP/7.5.3].** The construction phase traffic effects on all road users are considered. The assessment notes that the effects of the Proposed Development are temporary and not significant, following mitigation. The mitigation provided in **Outline CTMP [EN010158/APP/7.5.3],** including junction enhancements, addresses any significant effects predicted along the construction access route. This includes a provision that where possible and subject to approval from Buckinghamshire Council, the proposed road works to Snake Lane/Fiddlers Field would be undertaken outwith the summer school holiday period, so as not to adversely affect access to Hogshaw Farm and Wildlife Park.
3.36	Socio-economics, Page 18	**Socio-economics** Comment noting that there is no quantification of temporary economic disruption for farm operations, farm access routes or grazing arrangements. Further comment noting the remedy would be to supply a full analysis of agricultural displacement, including compensation, alternative land strategies, and long-term economic loss.	The Applicant has undertaken an assessment of the scale of indicative land use and employment capacity change in the agricultural economy, effects on agricultural and non-agricultural businesses, and a review of effects on the tourist economy, as required by NPS EN-1 (2023), within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2].** With regard to the adequacy and implications of land swaps, the Applicant has provided an appropriate level of information about compensation, mitigation and land-swaps in within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** without disclosing confidential and commercially sensitive information about Interested Parties.

			Details of land areas remain confidential to the parties involved and the Applicant does not have authority to release these details. However, the Applicant notes that the Written Representations from Prestons' Farms and TCS Biosciences Ltd **[REP1-133]** has indicated the replacement land on a plan. Information is also included at the request of the Examining Authority in response to Q1.9.3 of the **Examining Authority's Written Questions 1 (ExQ1) [PD-010],** within the **Applicant's Response to the Examining Authority's First Written Questions [EN010158/APP/8.13].** A note on the approach to minimising private loss was submitted at Deadline 1 in Appendix 1 to the **Written Summary of Applicant's Oral Submissions at Compulsory Acquisition Hearing 1 (CAH1) [EN010158/APP/8.7] [REP1-107].**
3.37	Socio-economics, Page 18 and 19	**Socio-economics** Comment noting that there is no assessment of wider effects on community identity and rural character, both material to socio-economic wellbeing.	For population and socio-economic impacts, the areas for assessment, and the sensitive receptors, were set out within **ES Volume 4, Appendix 5.1: EIA Scoping Report [EN010158/APP/6.4] [APP-079]** and developed and agreed through consideration of the comments raised by the Planning Inspectorate and Statutory Consultees within **ES Volume 4, Appendix 5.2: EIA Scoping Opinion [EN010158/APP/6.4] [APP-080]**. This does not include "wider effects on community identity and rural character", which is not a required assessment area under the policy framework or in guidance relevant to the assessment set out in **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2].** However, components which may be considered to contribute to community identity and rural character have been assessed across the ES, including: • A consideration of the effects on Public Rights of Way and community access, local employment and business, within **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2];** • Cultural heritage effects, within **ES Volume 2, Chapter 9: Cultural Heritage [EN010158/APP/6.2.2];** and • Effects on landscape character, within **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2].**
3.38	Socio-economics, Page 18	**Socio-economics** Comment that the Applicant should commit to local workforce and procurement policies, maximising employment within Buckinghamshire	**ES Volume 2, Chapter 14: Population [EN010158/APP/6.2.2]** provides a reasonable estimate of the scale and location of net additional employment – applying average workforce mobility assumptions from industry surveys, and standard additionality assumptions (displacement, leakage). To help maximise the positive gain for the local economy from the beneficial effect arising from employment generation during the construction and operation (including maintenance) phase, an **Outline ESSCP [EN010158/APP/7.14.3]** supports the DCO Application. Buckinghamshire Council is the host authority for the Proposed Development, and the relevant planning authority responsible for approval of the detailed Employment, Skills and Supply Chain Plan (which must be in accordance with the **Outline ESSCP [EN010158/APP/7.14.3]**) and therefore would be able to work with the Applicant to direct measures to be secured within the detailed Employment, Skills and Supply Chain Plan to the primary benefit of its residents and businesses.

3.39	Socio-economics, Page 19	**Socio-economics** Comment that all socio-economic commitments should be secured through the OEMP, including local engagement, notification procedures, and business support measures.	Commitments relevant to the socio-economic assessment (that would provide mitigation, for example, for potentially affected businesses and communities) are secured through a number of different management plans. As indicated in the **Written Summary of Applicant's Oral Submissions at Compulsory Acquisition Hearing 1 (CAH1) [EN010158/APP/8.7] [REP1-107]**, the Applicant has updated the **Outline CEMP [EN010158/APP/7.2.3], Outline OEMP [EN010158/APP/7.3.3]** and **Outline DEMP [EN010158/APP/7.4.3]** at Deadline 1 to include bespoke mitigation to address the sensitivity of nearby businesses, particularly Preston Farms and TCS Biosciences Ltd. Such management plans also include details of mitigation measures – including the management of environmental effects, monitoring and engagement protocols, and traffic management (in the **Outline CTMP [EN010158/APP/7.5.3]**) as well as ecological and landscape interpretation measures (in the **Outline LEMP [EN010158/APP/7.6.3])** and access improvements (in the **Outline RoWAS [EN010158/APP/7.8.3]**) that will manage the potential for adverse effects that could otherwise affect the operation of businesses.
3.40	Materials and Waste, Page 20	**Materials and Waste** Comment noting a lack of clarity on chain-of-custody controls and how compliance with waste duty-of-care requirements will be demonstrated. Further comment noting the remedy would be to supply decommissioning-phase waste analysis, including panel and BESS recycling pathways.	The Applicant will manage all waste arisings from the construction, operation (including maintenance) and decommissioning in line with the measures that are set out in the **Outline Site Waste Management Plan** which forms Appendix 1 of the **Outline CEMP [EN010158/APP/7.2.3]** which is secured in Requirement 11 of the **Draft DCO [EN010158/APP/3.1.4]**. This includes detail of the duty of care requirements and best practice, which will be monitored and controlled by the Applicant, Project Manager / Director, Site Manager and sub-contractors. Further detail will be included in the detailed Construction Environmental Management Plan, detailed Operational Environmental Management Plan and detailed Decommissioning Environmental Management Plan which will be submitted and approved to the Relevant Planning Authority, in consultation with the Environment Agency.
3.41	Climate Change, Page 21	**Climate Change** Comment noting that there is limited analysis of how flood risk, drainage and groundwater changes under climate-change scenarios may affect infrastructure such as the BESS, inverters and access tracks. Further comment noting the remedy would be to update drainage and flood modelling to incorporate climate-change uplift and long-term hydrological shifts.	A site-specific flood risk assessment has been prepared for the Proposed Development, which takes into account the effects of climate change. Further detail is presented within **ES Volume 2, Chapter 16: Water [EN010158/APP/6.2.2] [REP01-042]**, **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4.2] [PDA-004]** and **ES Volume 4, Appendix 16.2: WFD Waterbodies Stage 1 Screening Assessment [EN010158/APP/6.4.2] [REP1-070]**. A Flood Management Plan will be secured by the **Outline OEMP [EN010158/APP/7.3.3]**.
3.42	Climate Change, Page 21	**Climate Change** Comment noting that there is no clear assessment of cumulative carbon impacts, including embodied carbon in panels, batteries, steel and concrete. Further comment noting the remedy would be to provide a transparent carbon accounting summary, including embodied carbon and lifecycle emissions.	Lifecycle emissions from the Proposed Development are quantified in **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2] [APP-051]**, aligned with industry standard methodologies such as the Royal Institution of Chartered Surveyors Whole Life Carbon Assessment for the Built Environment (2023). This includes the emissions from the embodied carbon in solar PV panels, BESS, and construction materials such as steel and concrete, which are detailed in Table 8.11 of **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2] [APP-051]**. In accordance with the IEMA Guide to Assessing GHG Emissions and Evaluating their Significance (2023) , "All global cumulative GHG sources are relevant to the effect on climate change, and this should be taken into account in defining the receptor (the atmospheric concentration of GHGs) as

			being of 'high' sensitivity to further emissions. Effects of GHG emissions from specific cumulative projects therefore in general should not be individually assessed, as there is no basis for selecting any particular (or more than one) cumulative project that has GHG emissions for assessment over any other." Therefore, a detailed cumulative assessment would not be appropriate and has not been undertaken. However, generally the cumulative effect of the solar farm, and other renewable energy projects in the UK as a whole, would have an overall beneficial cumulative effect on the climate and the UK's ability to reach its Net Zero targets.
3.43	Climate Change, Page 21	**Climate Change** Comment noting that there is insufficient explanation of how the scheme will remain operationally resilient over a 40-year period in a changing climate. Further comment noting the remedy would be to demonstrate how infrastructure (especially the BESS) will remain safe and reliable under future temperature and humidity ranges.	Climate hazards and measures to mitigate and adapt to these during the operational (including maintenance) phase of the Proposed Development (i.e. over a 40 year period) have been identified in Table 10 in **ES Volume 4, Appendix 8.2: Climate Change Resilience Assessment [EN010158/APP/6.4] [APP-105]** and secured within the **Outline OEMP [EN010158/APP/7.3.3]**. Regarding BESS, as an example from Table 10 in **ES Volume 4, Appendix 8.2: Climate Change Resilience Assessment [EN010158/APP/6.4] [APP-105]**, "an increase in the magnitude and frequency of wildfire occurrences" has been identified as a risk that "may result in thermal runaway associated with the BESS." Measures to mitigate against this are specified and secured within the **Outline BSMP [EN010158/APP/7.9.3].** The BESS will be replaced during the 40 year lifecycle to ensure it remains operationally resilient and reliable. The battery is likely to integrate a liquid cooling system or an active Thermal Management System which optimises battery performance and reduces the risk of thermal runaway at high temperatures. A separate HVAC (Heating, Ventilation and Cooling) system provides temperature and humidity regulation within the BESS enclosure to ensure that all electrical equipment is working within recommended operating limits.
3.44	Climate Change, Page 21	**Climate Change** Comment noting that the decommissioning assumptions do not consider future climatic conditions, including increased storm events and hydrological shifts. Further comment noting the remedy would be to provide a decommissioning strategy that accounts for future extreme weather conditions.	**ES Volume 4, Appendix 8.2: Climate Change Resilience Assessment [EN010158/APP/6.4] [APP-105]** contains an assessment of future climate impacts on the decommissioning phase which include the consideration of extreme weather events and hydrological shifts.
3.45	Cumulative Effects, Page 22	**Cumulative Effects** Comment noting that there is a lack of a transparent methodology showing how individual topic assessments were combined into a project-wide cumulative judgement. Further comment noting the remedy would be to commit to additional mitigation where cumulative impacts remain significant, including layout refinement, strengthened planting, PRoW enhancements and noise controls	The cumulative assessment detailed in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3]** has been undertaken in accordance with the Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment (2024) and Institute of Environmental Management and Assessment: The State of Environmental Impact Assessment in the UK (2011) guidance. The mitigation measures laid out in each of the individual environmental topic chapters provide mitigation to avoid and reduce cumulative effects, alongside effects associated with the Proposed Development on its own. For example, the noise barrier that is proposed around the Rosefield Substation acts as mitigation for Sion Hill Farm and reduces the cumulative noise effects associated alongside the East Claydon BESS. There is no additional mitigation above that has been specified in the Environmental Statement that is proposed to address cumulative effects.

Table 3-4: Emily Utley [REP1-164]

Ref	Para. Ref.	Topic Matter and Summary of Position	Applicant's Response
4.1	Paras 1 & 2	**Navigating Documents** Comment that the documentation provided is long and complicated, containing numerous hyperlinks and references to other complicated documents. Further comment that it is impossible to navigate or understand the impacts and mitigation of the Proposed Development, and that the complex navigation of the documents exacerbates a negative impact on mental health.	The Applicant acknowledges that there are a significant number of documents supporting the Application which are long and detailed. This is because the Proposed Development is a complex, nationally significant scheme and the Applicant has thoroughly and appropriately assessed, analysed and addressed the various impacts and benefits of the Proposed Development. The Applicant has prepared various documents designed to assist parties to navigate this information including: • the **Guide to the Application [EN010158/APP/1.2.7]** which signposts and provides an overview of relevant documents that make up the DCO Application; • the **ES Non-Technical Summary [EN010158/APP/6.4] [APP-077]** which provides a straightforward explanation of the findings of the Environmental Impact Assessment, which are reported in the Environmental Statement, including the likely significant environmental effects of the construction, operation (including maintenance) and decommissioning of the Proposed Development, and the measures proposed to protect the environment; • the **Commitments Register [EN010158/APP/6.4.2] [REP1-076]** which tracks commitments made by the Applicant in relation to DCO Application for the construction, operation (including maintenance), and decommissioning of the Proposed Development; and • the various summary sections in each technical chapter of the ES which set out the relevant conclusions of each assessment in a streamlined table. The Applicant will also continue to respond to various written questions from the ExA and submissions made by interested parties (as it has done in this document) by addressing a submission or query directly and then linking to relevant supporting documents in an effort to quickly direct the reader to additional information or detail. The Applicant understands that the examination process for the proposed construction of major infrastructure projects can be complex and create uncertainty which can be stressful or raise concerns for the community. The Applicant fully acknowledges these concerns and takes its responsibilities as a considerate developer seriously. The Applicant aims to work collaboratively with stakeholders throughout to help reduce any uncertainty.
4.2	Para 3	**Noise Impact Conclusions** Comment questioning how the conclusion on no significant effect from noise and vibration was formed given the material impacts highlighted throughout the ES.	The assessment presented in **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2.2] [REP1-040]** has identified that there is potential for significant adverse effects in the absence of additional mitigation. However, following the implementation of appropriate scheme of mitigation during all phases of the Proposed Development, the residual noise levels will not result in significant adverse effects, when assessed against the relevant British Standards.

4.3	Para 4	**Landscape and Visual Conclusions** Comment questioning the conclusion of no significant effect during construction despite the mention of high-medium receptors throughout the ES. Further comment that these conclusions are vague words with no substance and hat they don't respond to the written representations.	The Applicant maintains that the methodology, as set out in **ES Volume 4, Appendix 10.1: Rosefield LVIA Methodology and Assessment Criteria [EN010158/APP/6.4] [APP-110]** and the analysis, as set out in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** follows best practice as set out in the Guidelines for Landscape and Visual Impact Assessment, Third Edition, published by the Landscape Institute. Summary Table 10.14 in **ES Volume 2, Chapter 10: Landscape and Visual [EN010158/APP/6.2.2]** identifies the following significant effects during the construction phase: • LCA 5.7, LCA 7.3 and LCA 9.1. • North Buckinghamshire Way/Midshires Way, Bernwood Jubilee Way, PRoW between Calvert Road and HS2, PRoW between Botolph Claydon and Runts Wood, PRoW to Finemere Hill and PRoW, lanes and roads between East Claydon/East Claydon Road and to within Parcel 3. • Claydon House and Hogshaw Farm and Wildlife Park.

Table 3-5: Samuel William Field [REP1-302]

Ref	Para. Ref.	Topic Matter and Summary of Position	Applicant's Response
5.1	Paras 1 - 4	**Residential Visual Amenity Assessment** Comment highlighting that the visual material submitted within **ES Appendix 10.5: Residential Visual Amenity Assessment [EN010158/APP/6.4]** is unrealistic as it does not represent how the human eye perceives the landscape. Further comment that several images appear to have been taken from deep within interior rooms or positions set back from windows, and that these positions under-represent the true visual impact of the Proposed Development on landscape and heritage.	As stated at paragraph 1.6.15 in **ES Volume 4, Appendix 10.5 Residential Visual Amenity Assessment [EN010158/APP/6.4] [APP-114]** the assessment of visual effects on properties considered in the detailed assessment is supported by a range of visual aids, photography and visualisations. The inset photographs within this document are intended to provide context to the narrative description and are not described as providing an accurate representation of views. As noted, due to limitations of accessibility, two internal views were required to be set back from windows at Pond Farmhouse which was under renovation at the time of the visit. The accurate representation of views from properties are provided in **ES Volume 4, Appendix 10.6: LVIA Visualisations [EN010158/APP/6.4.3]** and have been prepared in accordance with Landscape Institute best practice guidance as set out in paragraphs 2.10.11-2.10.22 of **ES Volume 4, Appendix 10.1: Rosefield LVIA Methodology and Assessment Criteria [EN010158/APP/6.4] [APP-110]**. It should be noted that in order to provide an accurate representation of scale, the viewing/printing size of the image should be at paper size A1 width of 840mm.
5.2	Para 6	**Accuracy of photographs and photomontages** Images (on pages 2 – 6) taken by the author of the response have been included in the submission for a more accurate view of how people interact with what they see.	This matter is addressed at Ref. 5.1 above.

Table 3-6: Kay Rutland [AS-041]

Ref	Para. Ref.	Topic Matter and Summary of Position	Applicant's Response
6.1	Para 1	**Biodiversity** Comment that solar farms are inefficient, and that solar farms of the scale of the Proposed Development increase the local air temperature. This affects the microclimate and biodiversity.	Solar PV modules do get hot when in direct sun, but do not have the thermal mass to retain heat after direct solar radiation stops and will quickly cool down. Based on the Applicant's experience of utility projects, the newer bifacial glass/glass panels block some, but not all the sunlight, unlike the older monofacial with a back sheet. This in turn creates a shaded, slightly cooler microclimate with less water evaporation where grass can thrive. The vegetation proposed underneath and around the Solar PV modules has been designed to incorporate a range of legume species of value to pollinators and other invertebrate species. It is proposed to graze extensively under Solar PV modules with sheep, to help maintain floristic diversity as well as the droppings which would further benefit some species of invertebrates. This coupled with the suite of mitigation measures outlined in **Outline LEMP [EN010158/APP/7.6.3]** has been specifically designed to benefit invertebrate species and bat prey.
6.2	Para 3	**Crop production** Comment that the land has been producing extremely good crops for generations, and that the grade stated for crops does not make sense given the farmers land that is being taken away produces high quality crops and cows.	The ALC grading outlined in **ES Volume 4, Appendix 12.1: Agricultural Land Classification Report [EN010158/APP/6.4] [APP-126]** considers the versatility and consistency with which land can support a wide range of crops over time based on the physical characteristics of present soils. The majority of the area within the Order Limits is classified as Grade 3b, which is defined as: *"Land capable of producing moderate yields of a narrow range of crops, principally cereals and grass or lower yields of a wider range of crops or high yields of grass which can be grazed or harvested over most of the year."* Food security has been assessed as part of the cumulative assessment and found to be not significant as described in **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2.3].** It is therefore plausible for land to support productive grazing or good crop yields but lack the flexibility or crop range necessary for the higher quality classifications considered Best and Most Versatile (BMV) land (Grades 1, 2 and 3a). Furthermore, effects of the Proposed Development on agricultural land quality and temporary and reversible. The **Outline Soil Management Plan [EN010158/APP/7.7.3]** will ensure that soils will be handled, stored and reinstated in accordance with best practice, with the land returned to at least its pre-construction quality where possible. In addition, the reduction in intensive cultivation during the operational period has potential to maintain, and in some respects improve, soil structure and soil health prior to decommissioning.

Rosefield
Solar Farm

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